

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA

IN RE: ANN J. HARTUNG  
Debtor

Chapter 13  
Case No.: 23-50232

**MOTION TO EXTEND TIME TO FILE SCHEDULES AND PLAN**

Comes now Ann J. Hartung, Debtor, by counsel, and respectfully moves the court for entry of an order allowing the time to file the Chapter 13 Schedules and Plan to be extended from June 16, 2023.

1. Pursuant to order of this Court (Docket No. 17), schedules and plan for this case are directed to be filed by June 16, 2023.

2. During the preparation of the remainder of filings, a title search was conducted which uncovered several judgment liens affecting debtor's real estate. These liens require substantial change in the composition of the debtor's proposed plan and materially affect the feasibility of her plan.

3. A short extension of time to file the schedules and plan is necessary for counsel to consult with the Debtor and discuss the structure of her plan and the disposition of her case.

**WHEREFORE**, Debtor asks that the Court grant an extension of time within which to complete and file the Chapter 13 Schedules and Plan.

Dated this June 16, 2023.

Respectfully submitted,

ANN J. HARTUNG

By: /s/ William Harville, Esq.  
OF COUNSEL

William Harville, Esq.  
VSB#19802  
327 W. Main Street, #3  
Charlottesville, VA 22903  
Voice: 434-483-5700  
Fax: 434-448-0800

### NOTICE OF HEARING

Notice is hereby given that a hearing on Debtor's Motion to Extend Time to File Amended Schedules and Plan is scheduled to be held on **July 12, 2023, at 9:30 a.m.** The hearing in this matter will be conducted by video conference at <https://www.zoomgov.com/j/1603692643> and may be accessed by using the **Meeting ID 160 369 2643**.

/s/ William Harville  
*Counsel for Debtor*